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Attorneys for Plaintiff
JINA HANSON

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

JINA HANSON; an individual)	Case No. 4:14-CV-02413-DMR
)	
Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER RE CONTINUANCE OF
vs.)	DEADLINE FOR COMPLETING
)	MEDIATION
APPLE, INC., a Corporation; JEANNINE)	
NITTNER and DOES 1 through 15,)	Judge: Hon. Donna M. Ryu
inclusive,)	Courtroom: 4
)	
Defendants.)	Action Filed: May 23, 2014
)	Trial Date: November 2, 2015
)	
)	

WHEREAS, the deadline for completing mediation in this case is currently scheduled for January 16, 2015;

WHEREAS, plaintiff has been deposed and depositions of defendant Apple, Inc. employees have been scheduled with the last one to be completed on January 6, 2015;

WHEREAS, the parties will not be in a position to evaluate this case for

1 settlement until the depositions are completed on January 6, 2015;

2 WHEREAS, plaintiff's counsel, Kirk B. Freeman, is scheduled to begin a two
3 week jury trial in San Francisco Superior Court in the case of *Gabriel A. Jackson v. Mary*
4 *A. Hughes, et. al.* (Case No. CGC-12-521690 on January 12, 2015;

5 WHEREAS, Mr. Freeman will not have time to prepare for and participate in a
6 mediation in this case between January 7 and 16, 2015 because of his trial commitment;
7 and

8 WHEREAS the parties and the mediator, Kristen Maloney, have met and
9 conferred on a mediation date and have selected February 18, 2015 for the mediation.

10 NOW, THEREFORE, IT IS HEREBY STIPULATED by the parties, through their
11 counsel of record:

- 12 1. The mediation in this case will take place on February 18, 2015;
13 2. For this reason the parties respectfully request that this Court continue until
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February 25, 2015 the deadline for completing the mediation.

Dated: November 24, 2014

LAW OFFICES OF KIRK B. FREEMAN

/s/ Kirk B. Freeman

Kirk B. Freeman
Attorneys for Plaintiff
JINA HANSON

Dated: November 24, 2014

JACKSON LEWIS LLP

/s/ Mitchell F. Boomer

Mitchell F. Boomer
Attorneys for Defendants
APPLE, INC. and JEANNINE NITTNER

GOOD CAUSE APPEARING, IT IS HEREBY ORDERED THAT:

1. The deadline for completing the mediation in this case is continued to February 25, 2015.

Dated: November 24, 2014

